

# International Privacy Risk Management: Enterprise Challenges and Observations

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# International Privacy Compliance: Enterprise Challenges and Observations

- Privacy Risk Management Elements:
  - Training
  - Enforcement
  - Audits
  - Review, updates and maintenance
  - Public Relations
  - Corporate Communications

# International Privacy Risk Management: Enterprise Challenges and Observations

## Training

- Privacy Policies
  - Business partners and vendors should actually understand your privacy policy.
    - Written testimonials and covenants may not suffice.
- Make sure your employees, business partners and other key parties know their responsibilities, as well as the role they serve in the company's privacy program.

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## Enforcement

- Contracts
- Physical Security
  - Typically overlooked in favor of system security.
    - Acxiom (credit bureau) had a server stolen last year.
  - Consider:
    - Locks on the doors
    - Alarms and Guards
    - Segregation of Work Areas
    - Employee Screening
    - Fire Suppression
    - Electrical Power Interruption

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- Enforcement (Cont.)
  - Presence
    - Have employees of your company on-site at the vendor.
  - Third Parties
    - Consider retaining specialized third parties to supervise security at each of your vendors.

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## Audits

- Risk-Based
  - One size does not fit all.
    - Your privacy program must aim to expand or contract audit activity to the level of risk presented.
    - A shot-gun approach can appear as a red flag to outside parties.

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## Review, update and maintenance

- Policies (all locations)
- Procedures

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## Public Relations

- Marketplace Sensitivities
  - Customer Stress Levels Increasing:
    - Aftershocks of the bubble-burst
      - Nest-egg depreciation
      - Unemployment
    - Viruses, hacks, worms, spam
    - Identity theft
    - Erosion of public confidence resulting from corporate governance crisis
    - Lingering fear of terrorism, war and global instability



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## Public Relations (cont.)

- Regulation
  - U.S. legislators are expected to expand regulation of off-shore information sharing in the coming year.
  - Develop a strategy for managing customer expectations.
    - Have a Q&A ready and train your representatives for addressing customer concerns.
- Breach simulation

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## Corporate Communications

- Industry Sensitivities
  - Consumer concerns and regulatory issues have brought about enhanced risk management practices, internal controls and data privacy practices.
    - Gramm-Leach-Bliley
    - Patriot Act
    - Sarbanes-Oxley
    - Basel 2
    - Increased focus on operational risk management practices
    - Heightened awareness of business resiliency issues

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## Corporate Communications (cont.)

- On-going executive sponsorship, prioritization and focus
- Strategic Planning
  - Business Decisions
    - Businesses must consider cost and ability to conduct on-going risk management in making the decision to expand into new international markets.